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UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

HUMAN RIGHTS DEFENSE CENTER, a Washington nonprofit corporation,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF JUSTICE; and its component, DRUG ENFORCEMENT ADMINISTRATION,

Defendants.

Case No. 2:20-cv-00674-JHC

PARTIES' SECOND STIPULATED MOTION AND ORDER TO EXTEND FILING DEADLINE FOR PLAINTIFF'S MOTION FOR FEES AND COSTS

NOTE ON MOTION CALENDAR: August 8, 2024

STIPULATED MOTION

Pursuant to Local Civil Rule 7(j) and 10(g), Plaintiff Human Rights Defense Center ("Plaintiff") and Defendants Department of Justice and Drug Enforcement Administration (collectively, "Defendants") move the Court for an order extending the time by which Plaintiff must file its motion for attorneys' fees and costs. Specifically, the Parties request an additional 31-day extension of the F.R.C.P. 54(d)(2)(B)(i) deadline as follows:

| Deadline | Current Date | Revised Date |
|---------------------------|-----------------|--------------------|
| Motion for Fees and Costs | August 23, 2024 | September 23, 2024 |

The parties have reached a tentative settlement agreement on Plaintiff's fees for this matter, and are currently finalizing the agreement and processing it for approval. Therefore,

PARTIES' SECOND STIPULATED MOTION FOR EXTENSION AND ORDER - 1 No. 2:20-cv-00674-JHC

| 1 | good cause exists to extend this deadline because the parties have reached a potential | | |
|---------|---|---|--|
| 2 | resolution, which obviates the need for expenditure of further litigant and judicial resource | | |
| 3 | Good cause also exists because there is no prejudice towards any party. Accordingly, the | | |
| 4 | Parties respectfully request the Court grant this Motion. | | |
| | | | |
| 5 | IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD | | |
| 6 | I certify that this paper contains 162 words, in compliance with Local Civil Rule | | |
| 7 | 7(e)(1). | | |
| 8 | DATED this 8 th day of August, 2024. | | |
| 9 10 | TESSA M. GORMAN United States Attorney | DAVIS WRIGHT TREMAINE LLP | |
| 11 | By s/ Kyle Forsyth | By <u>s/ Caesar Kalinowski IV</u> | |
| 12 | KYLE FORSYTH, WSBA #34609 Assistant United States Attorney | Eric M. Stahl, WSBA #27619 Caesar Kalinowski IV, WSBA #52650 | |
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| 15 | Email: kyle.forsyth@usdoj.gov | | |
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| 17 | | Attorneys for Plaintiff | |
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PARTIES' SECOND STIPULATED MOTION FOR EXTENSION AND ORDER - 2 No. 2:20-cv-00674-JHC

ORDER IT IS SO ORDERED. Dated this 8th day of August, 2024. 7 ohr H. Chun JOHN H. CHUN United States District Judge

PARTIES' SECOND STIPULATED MOTION FOR EXTENSION AND ORDER - 3 No. 2:20-cv-00674-JHC